

KEVIN G. HORBATIUK (KG-4977)
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Attorneys for Defendant
CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO., INC.
26 Broadway - 28th Floor
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(212) 482-0001

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
**IN RE COMBINED WORLD TRADE CENTER
AND LOWER MANHATTAN DISASTER SITE
LITIGATION**
-----X

21 MC 102 (AKH)

EDGAR ORELLANA,

**DOCKET NO:
07 CV 05398**

Plaintiff,

-against-

**100 CHURCH, LLC, ALAN KASMAN DBA
KASCO, AMBIENT GROUP, INC., ANN TAYLOR
TAYLOR STORES CORPORATION, BATTERY
PARK CITY AUTHORITY, BLACKMON-MOORING
STEAMATIC CATASTOPHE, INC., d/b/a BMS
CAT, BROOKFIELD FINANCIAL PROPERTIES,
INC., BROOKFIELD FINANCIAL PROPERTIES,
L.C., BROOKFIELD PARTNERS, L.P., BROOKFIELD
PROPERTIES CORPORATION, BROOKFIELD
PROPERTIES HOLDINGS, INC., CUNNINGHAM DUCT
CLEANING CO., INC., ENVIROTECH CLEAN AIR, INC.,
GPS ENVIRONMENTAL CONSULTANTS, INC.,
HILLMAN ENVIRONMENTAL GROUP, LLC INDOOR
AIR PROFESSIONALS, INC., INDOOR ENVIRONMENTAL
TECHNOLOGY, INC., KASKO RESTORATION SERVICES
CO., LAW ENGINEERING, P.C., MERILL LYNCH
& CO., INC., NOMURA HOLDING AMERICA, INC.,
NOMURA SECURITIES INTERNATIONAL, INC.,
RELATED BPC ASSOCIATES, INC., RELATED
MANAGEMENT CO., L.P., ROYAL AND SUNALLIANCE
INSURANCE GROUP, PLC., STRUCTURE TONE (UK), INC.,
STRUCTURE TONE GLOBAL SERVICES, INC.,
TOSCORP, INC., TRC ENGINEERS, INC.,**

**NOTICE OF
ADOPTION OF
ANSWER TO
MASTER COMPLAINT**

**VERIZON NEW YORK, INC., WESTON SOLUTIONS, INC.,
WFP TOWER B CO., G.P., CORP., WFP TOWER B
HOLDING CO., L.P., WFP TOWER B CO., LP., WFP
TOWER D CO., G.P., CORP., WFP TOWER D
HOLDING CO., I L.P., WFP TOWER D
HOLDING CO. II L.P., WFP TOWER
HOLDING CO., I G.P., CORP., WFP TOWER D
CO., L.P., and ZAR REALTY MANAGEMENT
CORP., et al.**

Defendants.

.....X
PLEASE TAKE NOTICE, that defendant **CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO., INC.** ("CUNNINGHAM"), by its attorneys, RUSSO,
KEANE & TONER, LLP, as and for its Response to the allegations set forth in the Complaint by
Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced
action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in
the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102
(AKH).

WHEREFORE, the defendant, CUNNINGHAM demands judgment dismissing the above
captioned caption action as against it, together with its costs and disbursements and for such other
and further relief as this Court deems just and proper.

Dated: New York, New York
January 10, 2008

Kevin G. Horbatiuk
Kevin G. Horbatiuk (KGH4977)
Attorneys for Defendant
**CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING
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TO: CHRISTOPHER R. LaPOLA, ESQ.,
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CERTIFICATION OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 10th day of January, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,
WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Attorney for Plaintiff
EDGAR ORELLANA
115 Broadway 12th Floor
New York, New York 10006

A handwritten signature in black ink, reading "Kevin G. Horbatiuk". The signature is written in a cursive, flowing style.

KEVIN G. HORBATIUK